

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

THE STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 5:21-cv-844 (XR)
(Consolidated Cases)

**UNOPPOSED MOTION FOR ENTRY OF STIPULATED CONFIDENTIALITY AND
PROTECTIVE ORDER REGARDING PRODUCTION OF ULTRASENSITIVE
INFORMATION**

Plaintiffs La Unión Del Pueblo Entero, Friendship-West Baptist Church, the Anti-Defamation League Austin, Southwest, and Texoma Regions, Southwest Voter Registration Education Project, Texas Impact, Mexican American Bar Association of Texas, Texas Hispanics Organized for Political Education, Jolt Action, William C. Velasquez Institute, FIEL Houston Inc., and James Lewin (collectively, the “LUPE Plaintiffs”) respectfully move for entry of the attached Stipulated Confidentiality and Protective Order Regarding Production of Ultrasensitive Information between the private plaintiffs and the county election official defendants in the above-captioned consolidated litigation (collectively, the “Parties”) under Federal Rule of Civil Procedure 26(c) and Local Rule CV-26. The Parties have met and conferred and anticipate production of sensitive, private, personal and confidential electronically stored information concerning non-party Texas residents in the course of this action.

Good cause exists to enter the Stipulated Confidentiality and Protective Order to expedite discovery, protect sensitive and confidential information, enable the Parties to prepare for

dispositive motions and trial, and address the handling of confidential material during and after the conclusion of this litigation. The Parties have stipulated to entry of the Confidentiality and Protective Order, and the United States, the State Defendants, and the county district attorney defendants do not oppose this motion for entry. Accordingly, the LUPE Plaintiffs respectfully request entry of the Stipulated Confidentiality and Protective Order.

DATE: March 28, 2022

Respectfully submitted,

/s/ Nina Perales

Nina Perales (Tex. Bar No. 24005046)
Julia R. Longoria (Tex. Bar No. 24070166)
MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL FUND
110 Broadway, Suite 300
San Antonio, TX 78205
Telephone: (210) 224-5476
Facsimile: (210) 224-5382
nperales@maldef.org
jlongoria@maldef.org

Michael C. Keats*
Rebecca L. Martin*
Jason S. Kanterman*
Kevin Zhen*
FRIED, FRANK, HARRIS, SHRIVER &
JACOBSON LLP
One New York Plaza
New York, New York 10004
Telephone: (212) 859-8000
Facsimile: (212) 859-4000
michael.keats@friedfrank.com
rebecca.martin@friedfrank.com
jason.kanterman@friedfrank.com
kevin.zhen@friedfrank.com

Attorneys for Plaintiffs
LA UNIÓN DEL PUEBLO ENTERO,
SOUTHWEST VOTER REGISTRATION
EDUCATION PROJECT, MEXICAN
AMERICAN BAR ASSOCIATION OF
TEXAS, TEXAS HISPANICS
ORGANIZED FOR POLITICAL

/s/ Patrick A. Berry

Sean Morales-Doyle (NY Bar No. 5646641)
Eliza Sweren-Becker* (NY Bar No. 5424403)
Patrick A. Berry* (NY Bar No. 5723135)
Jasleen K. Singh* (Cal. Bar No. 316596)
Andrew B. Garber* (NY Bar No. 5684147)
BRENNAN CENTER FOR JUSTICE AT NYU
SCHOOL OF LAW
120 Broadway, Suite 1750
New York, NY 10271
Telephone: (646) 292-8310
Facsimile: (212) 463-7308
sean.morales-doyle@nyu.edu
eliza.sweren-becker@nyu.edu
patrick.berry@nyu.edu
jasleen.singh@nyu.edu
andrew.garber@nyu.edu

Paul R. Genender (Tex. Bar No. 00790758)
Elizabeth Y. Ryan (Tex. Bar No. 24067758)
Matthew Berde* (Tex. Bar No. 24094379)
Megan Cloud (Tex. Bar No. 24116207)
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201
Telephone: (214) 746-8158
Facsimile: (214) 746-7777
paul.genender@weil.com
liz.ryan@weil.com
matt.berde@weil.com
megan.cloud@weil.com

Alexander P. Cohen* (Tex. Bar No. 24109739)
WEIL, GOTSHAL & MANGES LLP

EDUCATION, JOLT ACTION,
WILLIAM C. VELASQUEZ INSTITUTE,
FIEL HOUSTON INC.

767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8020
Facsimile: (212) 310-8007
alexander.cohen@weil.com

Attorneys for Plaintiffs:
FRIENDSHIP-WEST BAPTIST CHURCH,
ANTI-DEFAMATION LEAGUE AUSTIN,
SOUTHWEST, AND TEXOMA REGIONS,
TEXAS IMPACT, JAMES LEWIN

* Admitted *pro hac vice*

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule CV-7(G), I hereby certify that on March 24, 2022, I conferred by email with counsel for the United States, the State Defendants, and the county district attorney defendants regarding this motion for entry. The United States, the State Defendants, and the county district attorney defendants do object to entry of the proposed Stipulated Confidentiality and Protective Order.

/s/ Patrick A. Berry
Patrick A. Berry

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Patrick A. Berry
Patrick A. Berry